

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

DAILY NEWS, LP; CHICAGO TRIBUNE  
COMPANY, LLC; ORLANDO SENTINEL  
COMMUNICATIONS COMPANY, LLC; SUN-  
SENTINEL COMPANY, LLC; SAN JOSE  
MERCURY-NEWS, LLC; DP MEDIA  
NETWORK, LLC; ORB PUBLISHING, LLC;  
AND NORTHWEST PUBLICATIONS, LLC,

Plaintiffs,

v.

MICROSOFT CORPORATION, OPENAI, INC.,  
OPENAI LP, OPENAI GP, LLC, OPENAI, LLC,  
OPENAI OPCO, LLC, OPENAI GLOBAL, LLC,  
OAI CORPORATION, LLC, and OPENAI  
HOLDINGS, LLC,

Defendants.

Case No. 1:24-cv-03285-SHS-OTW

**[PROPOSED] ORDER  
GRANTING MOTION TO  
ADMIT COUNSEL  
PRO HAC VICE**

The motion of Elana Nightingale Dawson for admission to practice *pro hac vice* in the above captioned action is granted.

Applicant has declared that she is a member in good standing of the Bars of the State of Illinois and the District of Columbia and that her contact information is as follows:

Applicant's Name: Elana Nightingale Dawson

Firm Name: Latham & Watkins LLP

Address: 555 Eleventh Street, NW, Suite 1000

City/State/Zip: Washington, D.C. 20004

Telephone: (202) 637-2200 / Facsimile: (202) 637-2201

Applicant having requested admission *pro hac vice* to appear for all purposes as counsel for Defendants OpenAI, Inc., OpenAI L.P., OpenAI GP, L.L.C., OpenAI, L.L.C., OpenAI OpCo,

LLC, OpenAI Global, LLC, OAI Corporation, LLC., OpenAI Holdings, LLC (together, “OpenAI”).

**IT IS HEREBY ORDERED** that Applicant is admitted to practice *pro hac vice* in the above-captioned case in the United States District Court for the Southern District of New York.

All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys.

Dated: \_\_\_\_\_, 2024

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United States District Judge Sidney H. Stein